

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

KOREA CGM MEMBERS  
ASSOCIATION, a non-profit  
corporation organized and existing  
under the laws of the Republic of  
Korea,

Plaintiff,

v.

NETFLIX, INC., a Delaware  
corporation, and DOES 1-50, inclusive

Defendant.

C.A. No.

**DEMAND FOR JURY TRIAL**

**COMPLAINT FOR DAMAGES FOR DEFAMATION PER SE**

1. This is an action for defamation arising from false statements concerning plaintiff Korea CGM Members Association (“Plaintiff” or “CGM”) made by defendant Netflix, Inc. (“Netflix”) in the first 3 episodes of the Netflix documentary series entitled *In The Name of God: A Holy Betrayal* (“Series”), which was first released on March 3, 2023. CGM operates as the Christian Gospel Mission, a Christian organization, which is active in more than 60 countries, including the USA.

2. This action will show that Netflix made a decision with actual malice--knowledge of falsity and reckless disregard for truth or falsity--to portray CGM as a corrupt and criminal organization by making two sets of defamatory statements which can be summarized as follows: first, that CGM caused, condoned, encouraged or facilitated its members to procure young women for its leader’s sexual gratification, and second, that CGM caused, condoned, encouraged or facilitated its members to beat, kidnap, threaten and intimidate persons whom it perceived to be hostile (jointly, the “Defamatory Statements”). In reality, CGM

never caused or encouraged its members to take such alleged actions. Thus, this lawsuit is based firmly on statements of fact which are demonstrably false.

3. The Series is a poorly made documentary that is riddled with errors that were intentionally calculated to defame CGM through sensationalist manipulations and false misrepresentations, including faked scenes, fabricated events, sensationalist repetitions, English subtitles that mistranslate the Korean to create an unfavorable impression, an audio track that appears to have been fraudulently altered to create a false meaning, inclusion of footage that a Korean court had ordered should never be shown because it is misleading, blaming a violent kidnapping and a vicious beating on CGM even though a Korean court had ruled that CGM was not responsible for either, and heavy reliance on a witness who has multiple convictions and a documented history of making allegations about CGM and Jeong Myong-Seok (widely known as and hereinafter referred to as “Pastor Joshua”) and then admitting that they are false and withdrawing them. Such misconduct evidences the bias, dishonesty and unethical journalism that is a hallmark of the Series. These characteristics of the Series are also highly probative of actual malice, and provide important context to determine the meaning of the Defamatory Statements.

### **PARTIES, JURISDICTION AND VENUE**

4. At all material times, CGM is and was a nonprofit corporation organized and existing under the laws of Korea<sup>1</sup> with its principal place of business in Seoul, Korea.

5. Defendant Netflix, Inc. is a corporation organized and existing under the laws of the State of Delaware and has its principal place of business in

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<sup>1</sup> References in this complaint to “Korea” are to the Republic of Korea, i.e., South Korea.

California. It is a media giant whose programming is available world-wide with over 80 million subscribers in the USA and 260 million worldwide, and total revenues of almost \$34 billion in 2023.

6. Each episode of the Series has an opening credit stating, “A Netflix Documentary Series.” It is a “Netflix Original,” meaning that Netflix has acquired global rights and is distributing the Series worldwide to its hundreds of millions of subscribers and their guests on its ubiquitous streaming platform. Netflix was also closely involved in the production of the Series.

7. This Court has diversity of citizenship subject matter jurisdiction under 28 U.S.C. § 1332. CGM is a citizen of Korea and Netflix a citizen of Delaware. There is complete diversity among the parties, and the amount in controversy exceeds \$75,000.

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391 (b)(1) and (c)(2) because Netflix is incorporated in Delaware and is therefore subject to the court’s personal jurisdiction with respect to this action pursuant to 28 U.S.C. § 1332 (c)(1)

9. CGM is unaware of the true names and capacities of defendants named herein as Does 1 through 50, inclusive, but is informed and believes, and thereon alleges, that each of the fictitiously named defendants engaged in, or is in some manner responsible for, the wrongful conduct alleged herein. CGM therefore sues these defendants by such fictitious names and will amend this complaint to state their true names and capacities when such names have been discovered.

## **THE DEFAMATORY STATEMENTS**

### **1<sup>st</sup> Set Of Defamatory Statements: CGM Caused, Condoned, Encouraged Or Facilitated Its Members To Procure Young Women For Its Leader's Sexual Gratification**

10. A major theme running through the Series is the allegation that CGM's religious leader, Jeong Myong-Seok, also known as Pastor Joshua or JMS<sup>2</sup>, had sex with thousands of female CGM members ("Members") who had been recruited and groomed by other Members for the specific purpose of having sex with him. The Series shows that the procurement of these women had been institutionalized within CGM and had become part of its culture; and that another part of this culture was that more experienced Members who had already had sex with Pastor Joshua groomed younger Members by pressuring them to have sex with Pastor Joshua and afterwards reassuring them by pretending that this was completely normal. Thus, CGM is portrayed as an organization which provided Pastor Joshua with constant stream of young women who were willing to submit to his sexual demands. CGM denies that Pastor Joshua misbehaved in this manner, but in any event, it was certainly not aware of any such conduct and it never condoned, encouraged or facilitated it.

11. In the first episode, a young woman who claimed to have been sexually assaulted by Pastor Joshua stated that when she left his room after the first assault, she ran into one of the more experienced Members "who was overseeing things outside (and was) a link in the chain that brought women to" Pastor Joshua,

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<sup>2</sup> Confusingly, the Series uses "JMS" to refer sometimes to Pastor Joshua and sometimes to CGM (because JMS is an acronym for "Jesus Morning Star," a name that CGM has sometimes used).

and who instructed her not to have sex with anyone else from now on, and that though she might not understand what was happening at first, “she would understand everything in time.” (Episode 1, 38:41<sup>3</sup>).

12. A Member called Maple Yip claimed that she was persuaded by another Member identified as “J” to go to Pastor Joshua’s quarters at CGM’s headquarters and to sleep there because J had to travel. She claimed that Pastor Joshua sexually assaulted her that night and that the next day, she contacted J who reassured her that everything was fine, and said that she had left Ms. Yip in Pastor Joshua’s quarters on purpose so that they would have sex. (Episode 3, 29:27). In time, Ms. Yip took on the experienced Member’s role and groomed the younger Members. (Id. 37:47).

13. The Series shows that the women who slept with Pastor Joshua were rewarded with titles within CGM such as evangelists, probationers or informants and in time, they rose up the CGM ladder to become pastors. (Episode 1, 40:20). One of interviewees, a prominent anti-CGM activist called Kim Do-Hyeong (“KDH”), stated that “one of the biggest goals of missionary work is to bring (Pastor Joshua) more pretty women. It is an endless supply of women.” (Id., 40:31).

14. Ms. Yip said much the same thing, namely, that she was instructed to find attractive young women to convert: “we were basically looking for his brides.” (Id., 41:09). She said that if a member was successful and found young women for Pastor Joshua, they would be rewarded by CGM by being made a minister and given money. (Id., 41:29). KDH said that after a while, the victims

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<sup>3</sup> The time codes identifying the scenes where the statements appear in an episode are approximate.

start recruiting other women and bringing them to Pastor Joshua, adding. “That’s how the victims turn into the perpetrators.” (Id., 41:37).

15. Scenes containing similar allegations can also be found in Episode 3. A former Member identified as Amy alleges that she was sexually assaulted by Pastor Joshua while Ms. Yip was present, and that she looked at Ms. Yip who told her not to worry, that “it’s fine.” Ms. Yip explained on camera, “I was just acting like the women before me, like there was nothing wrong, so I did that too.” Amy accused Ms. Yip of being an enabler. Ms. Yip admitted that she was but claimed that she had been brainwashed. (Ep. 3, 36:00).

16. After Pastor Joshua left Korea in 2003 and travelled to Hong Kong, mainland China and elsewhere, the Series alleges that CGM instructed certain young members to go to CGM’s photographic studio in Seoul and pose in their underwear, or naked, or masturbating. (Episode 2, 26:10). Videos and still photographs were sent to Pastor Joshua in Hong Kong, who would send for the women whose tapes or photographs he liked to travel to his location so that he could have sex with them.

17. In these scenes, the first set of Defamatory Statements state or imply that:

(a) CGM caused, condoned, encouraged or facilitated its members to recruit attractive young women for the specific purpose of procuring them for Pastor Joshua’s sexual gratification;

(b) CGM rewarded its members for procuring young women for Pastor Joshua’s sexual gratification;

(c) CGM caused, condoned, encouraged or facilitated a system whereby Members who had previously been victims of Pastor Joshua’s sexual assaults became complicit in his later sexual misconduct by persuading attractive young Members to submit to him and by reassuring them afterwards that his sexual

activities were normal, a process known as grooming; and

(d) CGM knew that Pastor Joshua was sexually assaulting young Members on a regular basis but did nothing to stop it.

18. The statements of fact in these scenes are false. The true facts are that Pastor Joshua did not sexually assault a large number of Members, and in any event, (a) CGM was not aware of such conduct; (b) CGM did not encourage its members to recruit and convert attractive young women for the purpose of having sex with Pastor Joshua and neither caused, condoned nor facilitated such conduct; (c) CGM did not reward its members for recruiting or convert attractive young women who had sex with Pastor Joshua by promoting them or giving them money; (d) CGM was not aware of the alleged practice of using more experienced Members who had already had sex with Pastor Joshua to groom younger Members by persuading them to have sex with Pastor Joshua and afterwards by reassuring them that this was completely normal, and neither caused, condoned, encouraged nor facilitated such conduct.

19. The statements in these scenes are defamatory because they falsely portray CGM as a corrupt, immoral and criminal organization that institutionalized and condoned widespread sexual misconduct. These statements are defamatory per se because their import is apparent from the face of the Series without resort to any other source and because they import to the CGM crimes of moral turpitude.

**2<sup>nd</sup> Set Of Defamatory Statements: CGM Caused, Condoned, Encouraged Or Facilitated Its Members To Beat, Kidnap, Threaten And Intimidate Persons Whom It Perceived To Be Hostile**

20. Ms. Yip states that even before she left Hong Kong to fly to Korea to be interviewed for the Series, CGM not only tried to stop her but also threatened her. (Episode 1, 5:55). A CGM pastor acting on behalf of CGM is portrayed as stopping her at Hong Kong airport and delaying her departure so she missed her

plane. (Id., 6:27) She tried to leave the following day but was intercepted at the airport by a group of CGM members acting on behalf of CGM who tried to stop her leaving. (Id., 6:33). Footage purporting to show these events (which was presumably staged) is shown over Ms. Yip's comments, along with text messages from CGM members acting on behalf of CGM asking her not to go to Korea.

21. When she arrived in Seoul, Ms. Yip was shown being followed from the airport to her hotel by a car which then parked outside her hotel. (Id., 7:27). The clear implication communicated by the Series is that the car contained CGM members acting on behalf of CGM whose intent was to harass and intimidate Ms. Yip. Some unknown person is heard banging aggressively on her hotel room door at night, again with the implication that it was a CGM member intent on harassing or intimidating her. (Id., 8:42). She is shown to very afraid, and expressed worry that she might be killed or "something bad" might happen to her. (Id., 9:17). She related that before she left Hong Kong, CGM members met her mother and told her that if her daughter participates in the documentary, she will "face really great pressure." (Id. 9:40). Ms. Yip was in tears and said she was "totally terrified." (Id., 9:47).

22. Episode 2 begins with a television news broadcast from Seoul in 1999 which reported that "members of a religious group were arrested for kidnapping and beating a former female member" called Ms. Hwang who was abducted and then beaten for 4 hours. (Ep. 2, 0:56). Ms. Hwang was interviewed<sup>4</sup>, stating that after she left CGM because she claimed to have been sexually assaulted by Pastor Joshua, CGM members attacked her one night, punching and kicking her,

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<sup>4</sup> In fact, the woman shown in the interview is not Ms. Hwang but is rather an actress who had been hired for that specific purpose. Therefore, the audience has no way of knowing whether the words spoken by the actress are Ms. Hwang or whether they have been fabricated.



stomping on her hands and beating her all over. (Id., 1:34). They forced her into a van and drove her to CGM's headquarters. (Id., 2:22). This is presented not as an isolated event but as part of CGM's culture: "The church had a history of attacking those who left or criticized it." (Id., 6:55). The Series then shows that CGM members beat up an informant, who is shown saying "Group members beat me up claiming my criticism was unfounded." (Id., 7:04).

23. After Pastor Joshua was filmed and assaulted in Hong Kong by activists, the Series shows that CGM members were sent to beat up known anti-CGM activists such as KDH and other people who were perceived as hostile to CGM. Specifically, these members, who were described as "indoctrinated," were directed to "exterminate" KDH. (Id., 36:56-37:15).

24. A man named Kim Hyeong-Jin, who had been part of the team who had filmed Pastor Joshua in Hong Kong, said in the Series that he was threatened and intimidated. (Id., 37:38). He was then attacked on the stairs of his apartment building by three men with steel pipes. (Id., 39:03). One of the attackers later wrote about the attack. (Id., 39:20).

25. Most seriously of all, after KDH went into hiding, his elderly father was attacked and so badly beaten about the head with metal clubs that he had to be hospitalized. (Id., 42:16). KDH alleged that "they couldn't find me so they attacked my father instead." (Id., 44:50). The Series claimed that this attack was part of a CGM plan that it dubbed the "Fox Hunt Plan." (Id., 44:25). CGM got information about KDH and his family from CGM members who were prosecutors, as evidenced by the fact that the Police confiscated evidence after the incident including an eavesdropping device and notebooks containing KDH's family's names, addresses, phone numbers and car license plates. (Id., 45:06). They also bugged his parents' house, with (presumably staged) footage of suspicious-looking men entering and leaving a house. (Id., 45:21).

26. In Episode 3, the former member identified as Amy claimed that CGM “will do anything to try and stop members” from coming forward to allege that they had been sexually assaulted by Pastor Joshua because “we have the experience and stories that can ruin their religion.” (Ep. 3, 43:22).

27. The second set of Defamatory Statements contained in all of these scenes state or imply that CGM caused, condoned, encouraged or facilitated its members to beat, kidnap, threaten and intimidate anti-CGM activists and other persons whom it perceived to be hostile.

28. This is a false statement of fact. The true facts are that CGM did not cause, condone, encourage or facilitate its members to beat, kidnap, threaten and intimidate any persons.

29. In particular, but without limitation, the 26<sup>th</sup> Civil Division of the Seoul Central District Court issued a Decision to Recommend Reconciliation dated August 3, 2005, in a lawsuit filed by CGM and others against a broadcaster called SBS Co. Ltd., over certain programs which defamed the plaintiffs, including the same allegations that CGM’s members kidnapped and beat Ms. Hwang that appeared in the Series. The court ruled that the program “described that Plaintiff Christian Gospel Mission doesn’t accept freedom of secession, and that in order to suppress the fact of sexual relation between Jeong Myeong-seok and Ms. Hwang, Plaintiffs incited believers to kidnap, and commit violence to, Ms. Hwang. The fact is that everyone can freely join and withdraw from Plaintiff CGM, and Jeong Myeong-seok had no sexual relation with Ms. Hwang. In spite of that, Defendant damaged the reputation of Plaintiff by making a report as of Plaintiff Christian Gospel Mission was deeply involved in the kidnapping event of Ms. Hwang.” (Emphasis added). Despite this public ruling which was known to Netflix, it falsely stated or implied that CGM was responsible for Ms. Hwang’s kidnapping and beating.

30. The same court also ruled in a Judgment in the same case dated May 26, 2010, with respect to the beating of KDH's father that "the above-mentioned violence incident was only an accidental crime not related to Plaintiffs and which was committed by some red-blooded young believers. Also, Plaintiffs internally took strict disciplinary actions against young believers. In spite of that, it is wrong for Defendant to have made a report as if Plaintiffs instigated a violence incident." (Emphasis added). Again, despite this public ruling, Netflix falsely stated or implied that CGM was responsible for the brutal beating of KDH's father.

31. The statements in these scenes are defamatory because they falsely portray CGM as a criminal organization that institutionalized and condoned the beating, kidnapping, threatening and intimidation of persons whom it perceived to be hostile. These statements are defamatory per se because their import is apparent from the face of the Series without resort to any other source and accuse Plaintiffs of crimes of moral turpitude.

### **THE SERIES CONTAINS MULTIPLE ERRORS**

32. The Series is riddled with errors, both deliberate and intentional, including faked scenes, fabricated events, sensationalist repetition, English subtitles that mistranslate the Korean to create an unfavorable impression, an audio track that may have been fraudulently altered to create a false meaning, inclusion of footage that a Korean court had ordered should never be shown because it is misleading, and heavy reliance on a witness who has multiple convictions and a documented history of making allegations about CGM and Pastor Joshua, and then admitting that they are false and withdrawing them.

33. Episodes 1 and 3 both contain the same audio recording purporting to be of a conversation between Pastor Joshua and Ms. Yip after they had sex. Ms. Yip has claimed to have recorded it on an iPhone 11, which she no longer possesses. A forensic laboratory has identified inconsistencies and errors which

cast doubt over the authenticity and/or accuracy of the recording. Yet Netflix, knowing of these serious questions concerning the authenticity and accuracy of the recording, presented the recording to viewers as if it were authentic and the unaltered truth.

34. The Series includes numerous interviews with KDH, but does not disclose that he has at least 9 convictions for defamation, violence, distribution of pornography and making threats for which he was fined over 9 million Korean won (about \$67,000 USD). Nor does it disclose that KDH has a long and well documented history of making demands to CGM for money and then admitting that his demands have no validity and withdrawing them. For example, but without limitation,

a) In a November 1999 letter, KDH admitted that his previous accusations of adultery, prostitution, rape, abortion, etc., against Pastor Joshua “his brothers, executives, and other female believers, etc” were unfounded.

b) On March 14, 2005, KDH withdrew a lawsuit for fraud and embezzlement against JMS.

c) In a letter to Pastor Joshua dated July 21, 2005 KDH apologized for insulting him and damaging his reputation and promised that the website on which he made those insults would no longer be operated.

d) In an affidavit dated August 29, 2005, KDH withdrew a complaint against Pastor Joshua relating to the assault on his father.

e) In another affidavit of the same date, KDH withdrew a complaint for misuse of public funds against Pastor Joshua claiming he filed it because of a misunderstanding.

f) In a letter to Pastor Joshua dated March 17, 2005, KDH stated “I sincerely apologize for any misunderstandings that have defamed you and insulted you.”

35. The Series contains at least four scenes from the SBS programs which had been ruled to be misleading, and not to be rebroadcast, by the Seoul court in the Decision and Judgement described above.

36. The Series mistranslates Korean dialogue into English in several places. At one point, the words “this is God’s” were attributed to Pastor Joshua by inserting them into the English subtitles to read, “Don’t touch this, because this is God’s.” Suggestive female moans also appear to have been added to the audio track. At another point, the audio track was manipulated to suggest that Pastor Joshua was referring to himself as God, which he did not do. And at another point, a statement by Pastor Joshua that he had urinated 50 times after drinking mineral water was mistranslated to suggest that he was boasting of having 50 orgasms with Ms. Yip.

37. Such misconduct demonstrates the bias, dishonesty and unethical journalism that is a hallmark of the Series, constitutes evidence of Netflix’s actual malice, and provides important context to determine the meaning of the Defamatory Statements.

38. All of the facts alleged above support the allegation that Netflix acted with actual malice, as set forth below.

### **ACTUAL MALICE**

39. The first and second sets of Defamatory Statements set forth above (collectively, the “Defamatory Statements”) were made by Netflix with actual malice, defined as knowledge of falsity or reckless disregard for truth or falsity. Because media defendants never openly confess to publishing or broadcasting with actual malice, proof thereof may plausibly be inferred from indirect and circumstantial evidence, considered in its totality. As the United States Supreme Court explained in *Herbert v. Lando*, 441 U.S. 153, 164 n. 12 (1979): “The existence of actual malice may be shown in many ways. As a general rule, any

competent evidence, either direct or circumstantial, can be resorted to, and all the relevant circumstances surrounding the transaction may be shown, provided they are not too remote, including threats, prior or subsequent defamations, subsequent statements of the defendant, circumstances indicating the existence of rivalry, ill will, or hostility between the parties, facts tending to show a reckless disregard of the plaintiff's rights . . .” Netflix’s actual malice may plausibly be inferred from the facts pled herein.

40. A jury could plausibly and reasonably infer actual malice from Netflix’s failure to correct the falsities described in CGM’s application for an injunction to stop the broadcast of the Series which was filed in Seoul in February 2023 before the Series was released. While actual malice must be determined at the time of the publication of the false light or defamation, courts have long held that a subsequent failure to retract an obviously false and damaging statement may be probative of actual malice at the time the statement was originally made.

41. The facts pled above are sufficient in themselves to raise the plausible existence of actual malice in the overall and cumulative portrayal of CGM by Netflix, examining the entire Series as a whole. The facts reveal a deliberately callous decision by Netflix to enhance the dramatic impact of the Series by portraying CGM falsely and negatively, a decision made with knowledge of falsity or reckless disregard for truth or falsity. This decision was made within Netflix by the producers, executives, writers, and directors working for Netflix who were responsible for the defamatory content of the Series.

42. In addition to the existence of actual malice with regard to the false and defamatory portrayal of CGM considered as whole, Netflix broadcast all of the specific false statements of facts pled in this Complaint with knowledge of falsity or reckless disregard for truth or falsity. These knowing and reckless falsehoods

were made by the producers, executives, writers, showrunners and directors working for Netflix who were responsible for the defamatory content of the Series.

43. Netflix acted with knowledge of falsity or reckless disregard for truth or falsity in deliberately falsifying the true facts surrounding CGM. These knowing and reckless falsehoods were made by the producers, executives, writers, showrunners and directors working for Netflix who were responsible for the defamatory content of the Series. Among other things, Netflix knew that the principal witness responsible for driving the narrative of the Series, KDH, had been found guilty multiple times of engaging in deliberate defamatory falsehoods against CGM, had recanted and retracted the key accusations that his father was beaten by persons operating on CGM's instructions, Netflix knew that footage contained in the Series had been enjoined from broadcast in Korea due to the flaws and falsities contained in the footage, and Netflix knew and approved of fabricated scenes, deliberate mis-translations from Korean to English subtitles, and knew that key audio recordings lacked authenticity and reliability.

### **CLAIM FOR RELIEF**

#### **(Defamation Per Se)**

44. CGM repleads and incorporates by reference all the paragraphs in this Complaint above.

45. The Defamatory Statements consist of multiple statements of fact about CGM which are demonstrably false.

46. The Defamatory Statements falsely portray CGM as a corrupt and criminal organization. They should also be read in the context of the other false statements and errors pled herein whose cumulative effect is to increase their defamatory meaning. The Defamatory Statements are defamatory because they tend to expose CGM to public contempt, ridicule, aversion or disgrace, or to

induce an evil opinion of it, and they are defamatory per se because their import is apparent from the face of the Series without resort to any other source.

47. The magnitude of the harm to CGM caused by the defamation has been extraordinary by any plausible measure. The Series has been viewed by millions of people around the world, and as a result of Netflix's false portrayal of CGM as a corrupt organization, it has been subjected to a torrent of online abuse and has lost members and revenues, including a loss of charitable donations by persons deterred from associating with and supporting the CGM as a result of the Series, and general reputational harm to its reputational "brand" as an honest and trustworthy religious organization.

48. In pleading and establishing actual malice, CGM is entitled under First Amendment standards to recover actual and presumed damages. As a proximate result of the foregoing, it has suffered actual and presumed damages in an amount according to proof at trial but in any event in excess of the jurisdictional threshold of this Court.

49. Netflix's conduct as described herein was done with a conscious disregard of the rights of CGM, with the intent to maliciously vex, annoy, and/or harass it, and with motives of fraud and oppression exploiting it for its personal gain. Such conduct was unauthorized and constitutes oppression, fraud, and/or malice, entitling CGM to an award of punitive damages in an amount appropriate to punish or set an example of Netflix in an amount to be determined at trial.

50. The meaning conveyed by the false statements will, if published again, continue to cause CGM great and irreparable damage, and injunctive relief will be necessary to prevent and restrain continued dissemination of the statement. It is entitled to an injunction requiring Netflix, its agents and all persons acting in concert with it to desist from continuing to make the Defamatory Statements, and to remove them from the Series.



**PRAYER FOR RELIEF**

WHEREFORE, CGM prays for relief against Defendants, and each of them, as follows:

1. For actual and presumed damages;
2. For punitive damages;
3. For permanent injunctive relief, if after trial liability is found, restraining and enjoining Defendants, its agents and all persons acting in concert with them from continuing to make the Defamatory Statements, and to remove them from the Series;
4. For costs of suit and pre and post judgment interest; and
5. For such further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff KOREA CGM MEMBERS ASSOCIATION hereby demands trial by jury on all issues triable by a jury.

Dated: February 28, 2024

Respectfully submitted,

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